

Fill in this information to identify the case:

Debtor 1 Michael K. O'Connell

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of PA
(State)

Case number 1:16-bk-00168-HWV

Form 4100R**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: NewRez LLC d/b/a Shellpoint Mortgage Servicing Court claim no. (if known): 6

Last 4 digits of any number you use to identify the debtor's account: 2914

Property address: 605 Lindenwood Lane
Number Street

Harrisburg, PA 17133
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: / /
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: *3 mos. (2/2021-4/2021) (a) \$4,240.73*
@ \$1434.75 less
- b. Total fees, charges, expenses, escrow, and costs outstanding: suspense of \$63.52 + (b) \$
- c. **Total.** Add lines a and b. (c) \$4,240.73*

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

02 / 01 / 2021
MM / DD / YYYY

Debtor 1

Michael K. O'Connell

First Name

Middle Name

Last Name

Case number (if known) 1:16-bk-00168-HWV**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Kaitlin Shire
Signature

Date 04 / 13 / 2021

Print Kaitlin Shire
First Name Middle Name Last Name

Title Attorney for Creditor

Company Hill Wallack LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 777 Township Line Road, Suite 250
Number Street

Yardley, PA 19067
City State ZIP Code

Contact phone (215) 579 - 7700

Email kshire@hillwallack.com

ADDENDUM TO RESPONSE TO NOTICE OF FINAL CURE

Debtor: Michael K. O'Connell

Case No.: 1:16-bk-00168-HWV)

BK File Date: 1/19/16

Amount Due	Date Payment Was Due	How Payment Was Applied (Mo./Yr.)	Amount Received	Date Payment Received	Running Suspense Balance
\$1337.78	2/1/16	2/1/16 & Suspense	\$1387.36	2/8/16	\$49.58
\$1337.78	3/1/16	3/1/16	\$1337.78	3/29/16	
\$1337.78	4/1/16	4/1/16	\$1337.78	4/29/16	
\$1337.78	5/1/16	5/1/16	\$1337.78	5/21/16	
\$1337.78	6/1/16	6/1/16	\$1337.78	7/5/16	
\$1337.78	7/1/16	7/1/16	\$1337.78	8/2/16	
\$1337.78	8/1/16	8/1/16	\$1337.78	9/19/16	
\$1337.78	9/1/16	9/1/16	\$1337.78	11/1/16	
\$1337.78	10/1/16	10/1/16	\$1337.78	12/2/16	\$49.58
\$1337.78	11/1/16	11/1/16	\$1337.28	1/20/17	\$49.08
\$1337.78	12/1/16	12/1/16	\$1337.78	2/17/17	\$49.08
\$1356.93	1/1/17	1/1/17	\$4021.71	3/23/27	\$2713.86
\$1356.93	2/1/17	2/1/17	\$1356.93 from suspense		\$1356.93
\$1356.93	3/1/17	3/1/17	\$1356.93 from suspense		\$0.00
\$1356.93	4/1/17	4/1/17 & Suspense	\$1528.76	4/3/17	\$171.83
\$1356.93	5/1/17	5/1/17 & Suspense	\$1528.76	5/12/17	\$343.66
\$1356.93	6/1/17	6/1/17 & Suspense	\$1528.76	6/15/17	\$515.49
\$1356.93	7/1/17	7/1/17 & Suspense	\$1528.76	7/13/17	\$687.32
\$1356.93	8/1/17	8/1/17 & Suspense	\$1528.76	8/15/17	\$859.15
\$1356.93	9/1/17	9/1/17 & Suspense	\$1528.76	9/15/17	\$1,030.98
\$1356.93	10/1/17	10/1/17	\$1356.93	10/13/17	\$1030.98
\$1356.93	11/1/17	11/1/17	\$1356.93	12/14/17	\$1030.98
\$1356.93	12/1/17	12/1/17	\$1379.60	1/12/18	\$1053.65
\$1379.60	1/1/18	1/1/18	\$1379.60	2/14/18	\$1053.65
\$1379.60	2/1/18	2/1/18	\$1379.60	3/15/18	\$1053.65
\$1379.60	3/1/18	3/1/18	\$1379.60	4/18/18	\$1053.65
\$1379.60	4/1/18	4/1/18	\$1379.60	5/15/18	\$1053.65
\$1379.60	5/1/18	5/1/18	\$1379.60	6/15/18	\$1053.65
\$1379.60	6/1/18	6/1/18	\$1379.60	7/13/18	\$1053.65
\$1379.60	7/1/18	7/1/18	\$1379.60	8/15/18	\$1053.65
\$1379.60	8/1/18	8/1/18	\$1379.60	9/14/18	\$1053.65
\$1379.60	9/1/18	9/1/18	\$1379.60	10/15/18	\$1053.65
\$1379.60	10/1/18	10/1/18	\$1379.60	11/15/18	\$1053.65
\$1379.60	11/1/18	11/1/18	\$1379.60	12/17/18	\$1053.65
\$1379.60	12/1/18	12/1/18	\$1367.15	1/31/19	\$1041.20
\$1367.15	1/1/19	1/1/19	\$1367.15	3/29/19	\$1041.20
\$1367.15	2/1/19	2/1/19	\$3994.74	4/23/19	\$3,668.79
\$1367.15	3/1/19	3/1/19	\$1367.15	-----	\$2,301.64

{08724746; 1}

			from Suspense		
\$1367.15	4/1/19	4/1/19	\$1367.15 from Suspense	-----	\$934.49
\$1367.15	5/1/19	5/1/19	\$1367.15	5/30/19	\$934.49
\$1367.15	6/1/19	6/1/19	\$1367.15	7/5/19	\$934.49
\$1367.15	7/1/19	7/1/19	\$1367.15	8/2/19	\$934.49
\$1367.15	8/1/19	8/1/19	\$1367.15	9/27/19	\$934.49
\$1367.15	9/1/19	9/1/19	\$1367.15	10/30/19	\$934.49
\$1367.15	10/1/19	10/1/19	\$1367.15	11/27/19	\$934.49
\$1367.15	11/1/19	11/1/19	\$1337.78	1/29/20	\$905.12
\$1367.15	12/1/19	12/1/19	\$1337.78	2/28/20	\$875.75
\$1367.15	1/1/20	1/1/20 & Suspense	\$1371.23	3/31/20	\$879.83
\$1371.23	2/1/20	2/1/20	\$1371.23	5/4/20	\$879.83
\$1371.23	3/1/20	3/1/20	\$1371.23	5/28/20	\$879.83
\$1371.23	4/1/20	4/1/20	\$1371.23	6/29/20	\$879.83
\$1371.23	5/1/20	5/1/20	\$1371.23	7/30/20	\$879.83
\$1371.23	6/1/20	6/1/20	\$1371.23	9/1/20	\$879.83
\$1371.23	7/1/20	7/1/20	\$1371.23	10/28/20	\$879.83
\$1371.23	8/1/20	8/1/10	\$1371.23	11/30/20	\$879.83
\$1371.23	9/1/20	9/1/20	\$1371.23	12/31/20	\$879.83
\$1371.23	10/1/20	10/1/20	\$1371.23	2/4/21	\$879.83
\$1371.23	11/1/20	11/1/20	\$1371.23	3/12/21	\$879.83
\$1371.23	12/1/20	12/1/20	\$1371.23	3/31/21	\$879.83
\$1371.23	1/1/21	1/1/21	Paid from suspense	**10/1/2020	\$63.52
\$1434.75	2/1/21				\$63.52
\$1434.75	3/1/21				\$63.52
\$1434.75	4/1/21				\$63.52
Total: \$86,085.90					

Monthly payments past due:

3 mos. x \$1434.75 (Monthly payments 2/21-4/21)

\$ 4304.25

Total

\$ 4304.25

Less suspense

(\$ 63.52)

TOTAL As of April 13, 2021

\$ 4,240.73

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
(HARRISBURG)**

IN RE:

Michael K. O'Connell,
Debtor

CHAPTER 13

CASE NO.: 16-00168

Chief Judge Henry W. Van Eck

CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties indicated below of the Response to Notice of Final Cure of Creditor, NewRez LLC d/b/a Shellpoint Mortgage Servicing, in the manner indicated below on April 13, 2021:

Michael K. O'Connell
605 Lindenwood Lane
Harrisburg, PA 17113
Debtor
VIA REGULAR MAIL

James H. Turner
Turner and O'Connell
915 N. Mountain Road, Suite D
Harrisburg, PA 17112
Debtor's Counsel
Via ECF AND REGULAR MAIL

Charles J. DeHart, III
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Trustee
Via ECF AND REGULAR MAIL

United States Trustee
Office of United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101
Via ECF

By: /s/ Kaitlin Shire